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JUL 30 1993

KENTON COUNTY FIRE CHIEFS ASSOCIATION

FEDERAL COMMUNICATIONS COMMISSION

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The concern here is the costs involved. We are aware of the Joint Commenters comments "it appears that the reduction in transmitter deviation can be accomplished without great expense etc.". The wording "without great expense" can certainly have different values and/or meaning to different people. Without a definite dollar estimate here, this statement lacks credibility.

The proposed power level reduction is also of concern to our Organization. Kenton Co. is bounded on the North by the Ohio River, where the elevation above sea level is around 500ft. As one travels the Interstates I-75, -71, -275 to the interior of the County, the terrain becomes quite hilly and rises to better than 900ft. above sea level. Communications are a problem for most Departments. There are no repeater systems in place, just towers. Our experiences with the present system indicates that any reduction in power level would have significant consequences on radio communications in our area.

We would offer the following option for your consideration: that the Radio Manufacturers set a date, ASAP, after which they will only produce radios capable of handling both the wide and narrow band widths. By doing this at an early date, introduction of the narrow spacing spectrum system will be gradual, but effective and costs to customers can be extended over a greater period of time.

As you might have gathered from our comments, our major concern about these proposals is in the costs involved. We certainly realize that gradual progress is definitely needed in the communications arena. But, would like to stress that more time is needed, than that proposed, to implement such a widespread proposal especially without imposing undue economic hardship on many Departments.

We would like to take this opportunity to thank you for reviewing our comments and ask that if you have any questions to feel free to forward them to us.

Sincerely,

Jack Scheben

Jack Scheben, Secretary KCPCA.

cc:Chairman KCPCA., Dennis Halpin,
Chief-Taylor Mill, KY. Fire Department